



0000107006

January 25, 2010

ORIGINAL

DEFERRED

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

2010 JAN 27 P 4: 01

Re: Comments in Docket# T-20717A-09-0578

To Whom It May Concern:

Public Communications Services, Inc. (PCS) files this letter in order to comment on the application of Talton Communications, Inc. ("Talton") for a Certificate of Public Convenience and Necessity which is being reviewed in the above-named docket.

It has come to PCS' attention that Talton has recently applied for authority to provide Inmate Telephone Service within the State of Arizona. As you know, on December 23, 2009, PCS provided a letter to the Commission informing the agency that its research showed that Talton Communications, Inc. did not have the proper authorization to provide telecommunications services in Arizona.

In May 2009, Talton Communications, Inc. was awarded a national contract with Immigration and Customs Enforcement (ICE) to provide Inmate telephone services. That contract listed all the locations in which Talton Communications, Inc. was to provide service, including locations in Arizona. It is our understanding that Talton started providing Inmate telecommunications service in Arizona on November 20, 2009. Yet Talton Communications, Inc. did not seek certification from this State to be an authorized telecommunications provider until December 23, 2009, and only after PCS and Securus Technologies, Inc. (Securus) informed ICE and various state agencies of Talton's lack of operating authority. PCS questions whether Talton would have sought the proper certifications had it not been for PCS and Securus making these agencies aware of Talton's unauthorized operation.

In addition to Arizona, it is our understanding that Talton also began operations in the State of California and Washington prior to receiving proper state certifications.

PCS asks that the Commission take into consideration Talton's demonstrated disregard for complying with the statutes and administrative rules of Arizona when reviewing the Talton Application in Docket# T-20717A-09-0578.

Should you have any questions, please do not hesitate to contact me at the number listed below.

Sincerely,

Paul Jennings
CEO
Public Communications Services, Inc.
(310) 231-1000

Arizona Corporation Commission
DOCKETED

JAN 27 2010

